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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

Re: New DTV Channel *43 at Sacramento, California
La Dov Educational Outreach, Inc.
Supplement to Petition for Rulemaking

Dear Ms. Salas:

On behalf of La Dov Educational Outreach, Inc., enclosed for filing is a supplement to its Petition for Rulemaking filed on July 14, 2000 for the purpose of amending the digital television Table of Allotments to add a reserved DTV allotment on channel *43 at Sacramento, California.

Please contact this office if there are any questions.

Respectfully submitted,

John M. Burgett

John M. Burgett

cc: John Morgan (FCC/Rm. 2-C864)
Nai Tam (FCC/Rm. 2-C844)
Nazifa Naim (FCC/Rm. 2-C834)
Joan Sisk
Kevin Fisher

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JUN 19 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(b) of	)	MM Docket No.
the Commission's Rules, DTV	)	RM No.
Table of Allotments	)	
(Sacramento, California)	)	

To: The Chief, Allocations Branch

SUPPLEMENT TO
PETITION FOR RULEMAKING

La Dov Educational Outreach, Inc. ("La Dov"), by its attorneys and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. §73.623, hereby supplements the Petition for Rulemaking filed on behalf of La Dov on July 14, 2000 for the purpose of amending the Table of Allotments for the digital television ("DTV") service to add a reserved DTV channel allotment on channel *43 at Sacramento, California (the "Sacramento Proposal"). Specifically, La Dov supplements the Petition to include the attached engineering statement which specifies use of a new antenna model in order to minimize predicted interference to the allotment facility of digital television station KHSL-DT, Chico, California. It is emphasized that this supplement does not propose any other change whatsoever with regard to the technical parameters specified in the original Petition for Rulemaking.

Differences in the computer software programs employed by the FCC staff and La Dov's consulting engineers to calculate the interference situation with respect to the

Sacramento Proposal have resulted in different conclusions. The FCC staff's analysis concludes that the Sacramento Proposal would cause impermissible interference to more than 2 percent of the service population of KHSL-DT's allotment facility. La Dov's analysis concludes that the interference level is well below 2 percent. Nevertheless, in an effort to expedite matters and bring its proposed new television service to the public as quickly as possible, La Dov herein proposes the use of a different antenna model that will, as demonstrated in the attached engineering statement, ensure that the level of interference caused to KHSL-DT is well below the permissible 2 percent limit.

In light of the foregoing, La Dov respectfully requests that the Commission expeditiously commence a rulemaking proceeding to amend the DTV Table of Allotments to allot and assign DTV channel *43 to Sacramento, California, and to amend the NTSC Table of Allotments to delete channel *52 at Sacramento. If DTV channel *43 is allotted to Sacramento, La Dov intends to expeditiously amend its

pending application for a new noncommercial educational television facility at Sacramento to specify the new channel.

Respectfully submitted,

LA DOV EDUCATIONAL OUTREACH, INC.

By: _____
John M. Burgett

WILEY, REIN & FIELDING
1776 K Street, NW
Washington, DC 20006
(202) 719-7000

Its Attorneys

June 19, 2001

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of LA DOV EDUCATIONAL OUTREACH, INC., proponent of the substitution of noncommercial digital television (DTV) Channel 43 for NTSC Channel 52 in Sacramento, California, in support of this supplement to its Petition for Rulemaking BPRM-2000717ABT. The purpose of this supplement is to specify a new antenna model in order to avoid interference to the allotment facility of KHSL-DT, Channel 43 in Chico, California. No change in site location, antenna orientation, effective antenna height or effective radiated power is proposed herein.

The newly proposed operating parameters are listed in Exhibit B, and Exhibit C provides the antenna radiation pattern data for the proposed antenna.

Exhibit D is a tabulation of terrain and contour data for the proposed facility. The predicted service contours are plotted in Exhibit E. As shown, the entire community of Sacramento is contained within the proposed 48 dbμ contour, as required by §73.623(c)(1) of the Rules. Exhibit F is an interference study, which concludes that the proposed facility meets the requirements of the Rules with respect to both NTSC and DTV facilities.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 14, 2001

EXHIBIT B

PROPOSED OPERATING PARAMETERS

PROPOSED DTV ALLOTMENT
CHANNEL 43 - SACRAMENTO, CALIFORNIA
[SUPPLEMENT TO BPRM-20000717ABT]

Channel Number:	43
Zone:	2
Site Coordinates:	38-37-49N 120-51-20W
Antenna Structure Registration Number:	1011405
Tower Site Elevation (AMSL):	616.6 meters
Overall Tower Height Above Ground:	152.4 meters
Overall Tower Height Above (AMSL):	769 meters
Effective Antenna Height Above Ground:	132 meters
Effective Antenna Height (AMSL):	749 meters
Average Terrain Elevation (2-10 miles):	445 meters
Effective Antenna Height Above Average Terrain:	304 meters

Antenna

Make and Model:	Micro Communications 955158
Orientation:	230° T
Electrical Beam Tilt:	0°
Polarization:	Horizontal

Effective Radiated Power (main-lobe, maximum):	100 kw

EXHIBIT C-1

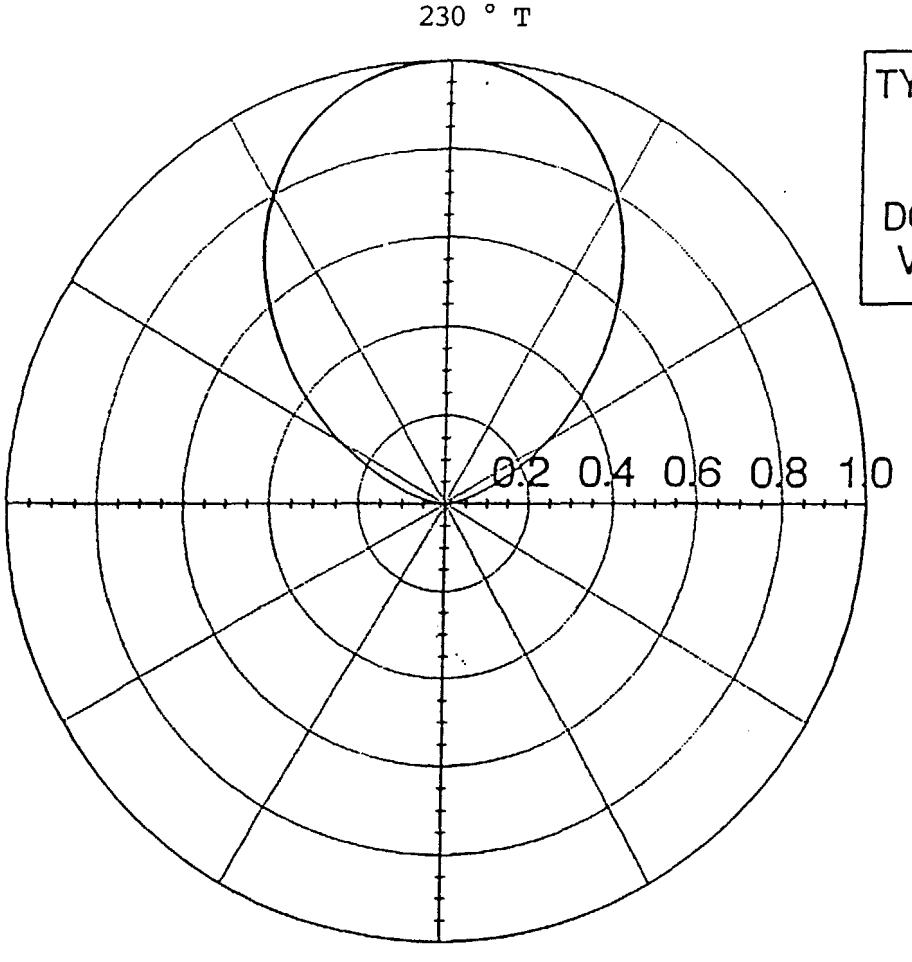
ANTENNA RADIATION VALUES

PROPOSED DTV ALLOTMENT
CHANNEL 43 - SACRAMENTO, CALIFORNIA
[SUPPLEMENT TO BPRM-20000717ABT]

Azimuth (° T)	Relative Field	ERP (dbk)	Azimuth (° T)	Relative Field	ERP (dbk)
0	0.01	-20.0	180	0.46	13.2
10	0.01	-20.0	190	0.64	16.1
20	0.01	-20.0	200	0.80	18.1
30	0.01	-20.0	210	0.91	19.2
40	0.01	-20.0	220	0.98	19.8
50	0.01	-20.0	230	1.00	20.0
60	0.01	-20.0	240	0.98	19.8
70	0.01	-20.0	250	0.91	19.2
80	0.01	-20.0	260	0.80	18.1
90	0.01	-20.0	270	0.64	16.1
100	0.01	-20.0	280	0.46	13.2
110	0.01	-20.0	290	0.28	8.9
120	0.01	-20.0	300	0.13	2.3
130	0.01	-20.0	310	0.03	-10.5
140	0.01	-20.0	320	0.01	-20.0
150	0.03	-10.5	330	0.01	-20.0
160	0.13	2.3	340	0.01	-20.0
170	0.28	8.9	350	0.01	-20.0

-Micro Communications, Inc.
Grenier Field * P.O. Box 4365 * Manchester, N.H. * USA
Tel. (603) 624-4351 * Fax (603) 624-4822

THEORETICAL AZIMUTH PATTERN IN RELATIVE FIELD



TYPICAL AZIMUTH PATTERN
UHF BAND IV/V
MCI 95551X
DOUBLE DOUBLETT PANEL
VERY NARROW CARDIOID

EXHIBIT C-2

-Micro Communications, Inc.
Grenier Field * P.O. Box 4365 * Manchester, N.H. * USA
Tel. (603) 624-4351 * Fax (603) 624-4822

THEORETICAL ELEVATION PATTERN IN RELATIVE FIELD

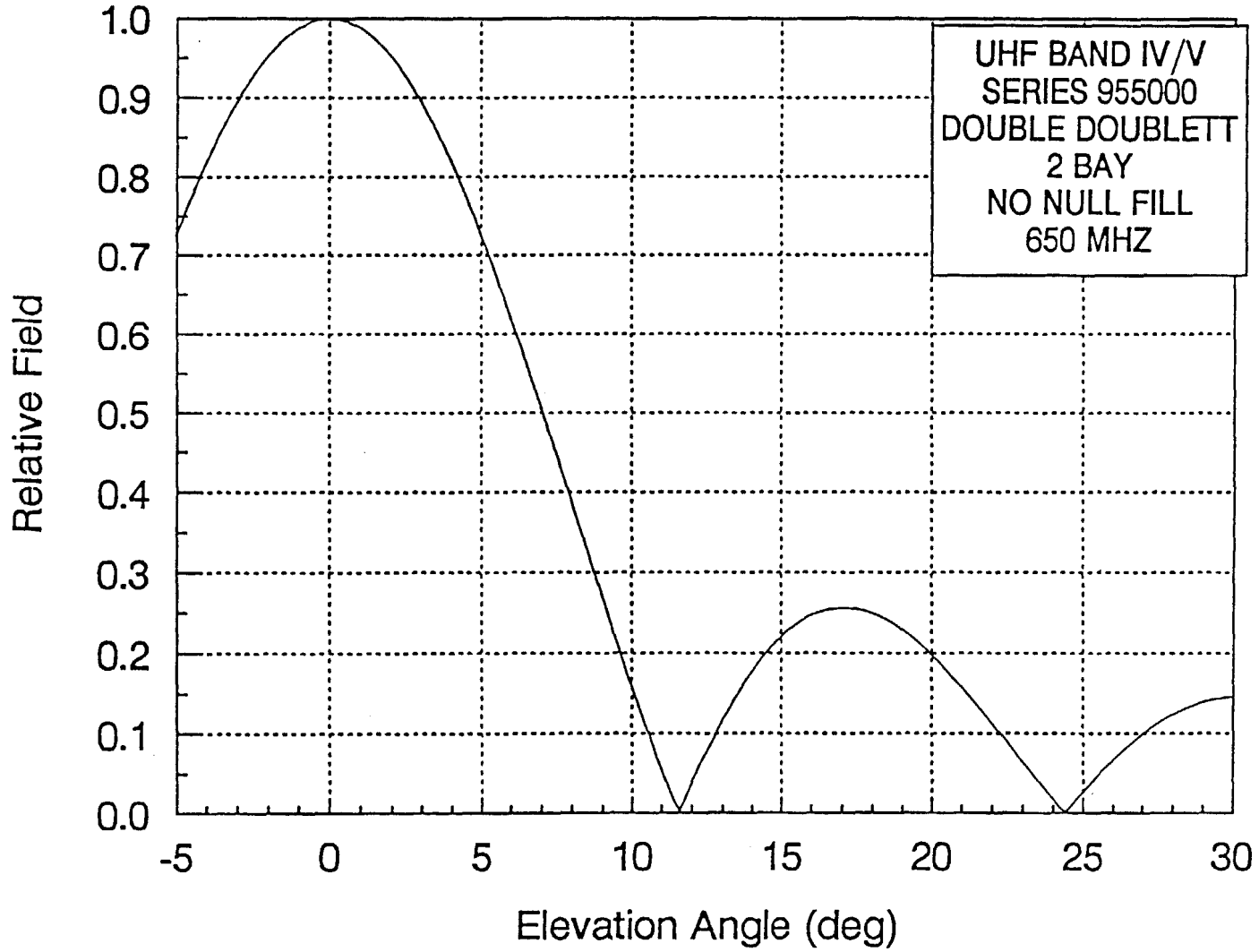


EXHIBIT C-3

EXHIBIT D

ELEVATION AND CONTOUR DATA

PROPOSED DTV ALLOTMENT
CHANNEL 43 - SACRAMENTO, CALIFORNIA
[SUPPLEMENT TO BPRM-20000717ABT]

Az. (° T)	Avg. Elv. AMSL 2 to 10 Miles meters*	Effective Ant. Ht. AAT meters	ERP (dbk)	Distance to Predicted Digital Contour (41 dbμ) km.
0	490	259	-20.0	26.6
45	567	182	-20.0	22.9
90	546	203	-20.0	23.9
135	523	226	-20.0	26.4
180	427	322	13.2	68.9
225	247	502	19.9	92.8
270	323	426	16.1	80.9
315	440	309	-14.0	38.5

Height of radiation center above mean sea level	749 meters
Height of average terrain above mean sea level	445 meters
Height of radiation center above average terrain	304 meters
Effective radiated power, main lobe, maximum	20 dbk, 100 kw

Geographic Coordinates

N 38° 37' 49" W 120° 51' 20"

**Source of terrain data: Defense Mapping Agency 3-second terrain database.*

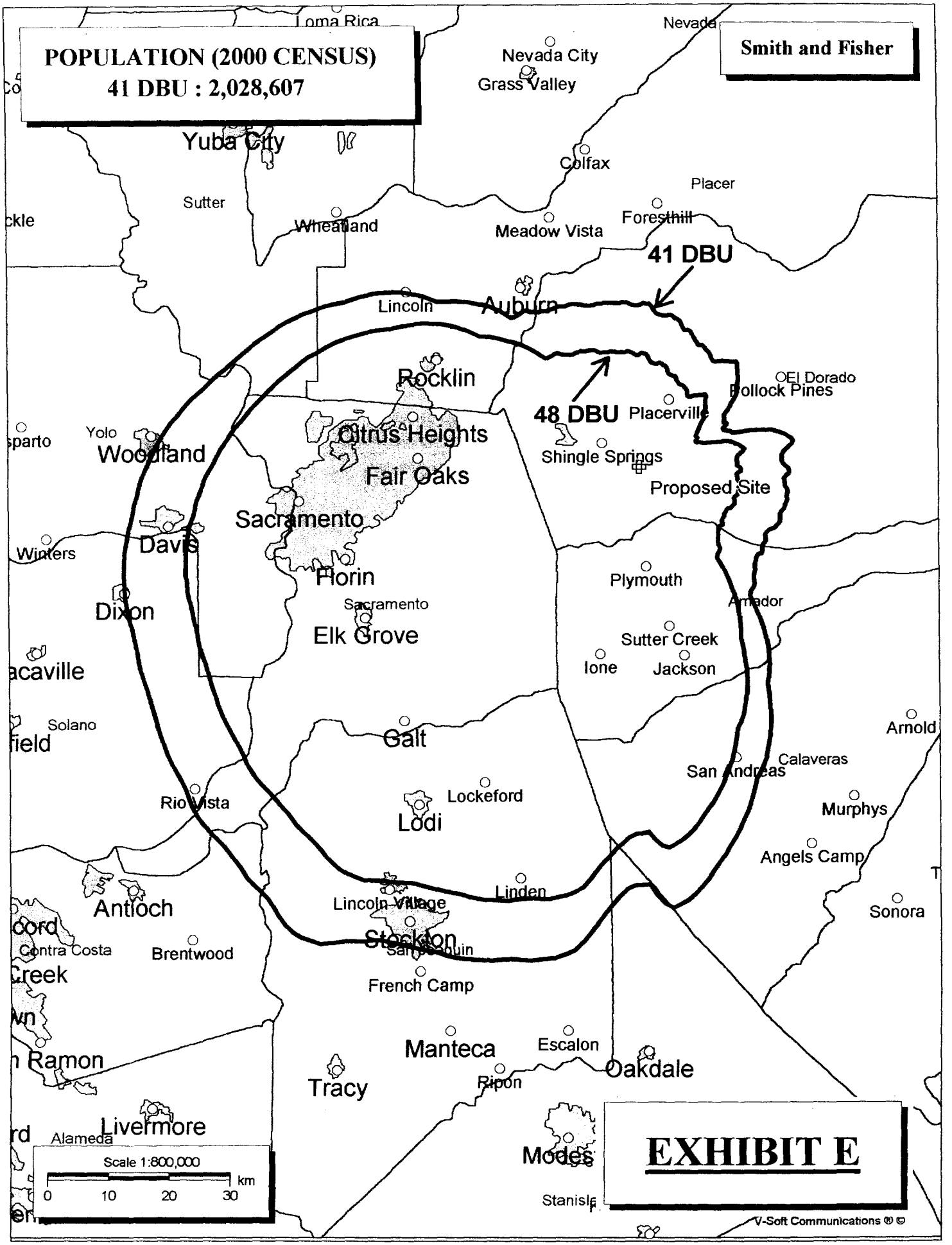

POPULATION (2000 CENSUS)
41 DBU : 2,028,607
Smith and Fisher
41 DBU
48 DBU
Proposed Site
Loma Rica
Nevada
Nevada City
Grass Valley
Yuba City
Colfax
Placer
Sutter
Wheatland
Meadow Vista
Foresthill
Lincoln
Auburn
Rocklin
El Dorado
Pollock Pines
Placerville
Shingle Springs
Yolo
Woodland
Citrus Heights
Fair Oaks
Sacramento
Davis
Winters
Florin
Sacramento
Elk Grove
Dixon
Plymouth
Amador
Sutter Creek
Ione
Jackson
Solano
Galt
Arnold
Calaveras
San Andreas
Rio Vista
Lockeford
Lodi
Murphys
Angels Camp
Linden
Antioch
Lincoln Village
Stockton
Sonora
Contra Costa
Brentwood
French Camp
Manteca
Escalon
Oakdale
Ripon
Tracy
Livermore
Alameda
Modesto
Scale 1:800,000
km
0
10
20
30
EXHIBIT E
V-Soft Communications ® ©

EXHIBIT F-1

ALLOCATION AND INTERFERENCE STUDY

PROPOSED DTV ALLOTMENT
CHANNEL 43 - SACRAMENTO, CALIFORNIA
[SUPPLEMENT TO BPRM-20000717ABT]

An interference study was conducted using the operating parameters of the facility described herein to determine if it meets the FCC's interference requirements of Section 73.623 of the Commission's Rules. Specifically, the proposed facility may not cause more than 0.5 percent interference to the service population of a DTV or NTSC facility.

The service area of a DTV station is defined as that which is calculated using the Longley-Rice propagation model to receive a signal of 41 dbμ or greater and lies within the predicted 41 dbμ contour of the station using the F(50,90) curves, the station's effective radiated power, and 2-10 mile terrain averages along each radial.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. This program utilizes a cell size of 1 kilometer, a spacing increment of 0.1 kilometer along each radial, and the 2000 U.S. Census data. Changes in interference caused by the proposed allotment facility to other pertinent stations are tabulated in Exhibit F-2.

As indicated, the proposed allotment would not contribute more than 0.5 percent DTV interference to the service population of any potentially affected NTSC or DTV station.

Therefore, this proposal meets the FCC's interference standards as defined in Section 73.623 of the Commission's Rules.

EXHIBIT F-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED DTV ALLOTMENT
CHANNEL 43 - SACRAMENTO, CALIFORNIA
[SUPPLEMENT TO BPRM-20000717ABT]

NTSC FACILITIES

Call Sign	City, State	Ch.	Grade B Population F(50,50)	INTERFERENCE LOSSES (POPULATION) NTSC Only	NTSC & DTV Without Proposal	Unmasked DTV	%[1]	NTSC & DTV With Proposal	Unmasked DTV	%[1]	Proposal Contribution	%[2]
-- NONE --												

DTV FACILITIES

Call Sign	City, State	Ch.	NTSC/DTV[3] Grade B Pop. Longley-Rice	INTERFERENCE LOSSES (POPULATION) NTSC Only	NTSC & DTV Without Proposal	Unmasked DTV	%[1]	NTSC & DTV With Proposal	Unmasked DTV	%[1]	Proposal Contribution	%[2]
KSBW-DT	Salinas, CA	43	5,640,070	392,096	395,951	3,855	< 0.1	398,463	6,367	0.1	2,512	< 0.1
KHSL-DT[3] (Allot.)	Chico, CA	43	643,988	0	0	0	0	2,156	2,156	0.3	1,526	0.2
KHSL-DT (CP)	Chico, CA	43	445,086	0	0	0	0	2,172	2,172	0.5	1,671	0.4

1 Cannot exceed 10% of Grade B Population.
2 Cannot exceed 0.5% of Grade Population.
3 The coverage area of this allotment is defined as that within the NTSC counterpart Grade B contour, since the allotment specifies an ERP of 1000 kw.